

# Exhibit M

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

Yunseo CHUNG,

*Plaintiff-Petitioner,*

v.

Donald J. TRUMP, in his official capacity as President of the United States of America; Marco RUBIO, in his official capacity as Secretary of State, U.S. Department of State; Pamela BONDI, in her official capacity as Attorney General, U.S. Department of Justice; Kristi NOEM, in her official capacity as Secretary of Homeland Security, U.S. Department of Homeland Security; Todd M. LYONS, in his official capacity as Acting Director, U.S. Immigration and Customs Enforcement; and William P. JOYCE, in his official capacity as Acting Field Office Director of the New York Immigration and Customs Enforcement Office,

*Defendants-Respondents.*

Case No. \_\_\_\_\_

**DECLARATION OF NAYANTARA BHUSHAN**

I, Nayantara Bhushan, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. My name is Nayantara Bhushan. I am a licensed attorney in good standing in the state of New York. I work at the Legal Aid Society.
2. I was connected to Yunseo Chung after her arrest on March 5, 2025.
3. On March 9, 2025, Ms. Chung received a text message from someone purporting to be from the police, asking to speak to her about her arrest. I have personally reviewed a screenshot of the text message.

4. I learned that simultaneously, Ms. Chung's parents had been visited by law enforcement agents at their home outside of New York City.
5. I called the number that had texted Ms. Chung in the evening on March 9, 2025.
6. This individual identified herself as Audrey, and as working with Homeland Security Investigations. I do not recall her last name.
7. She stated that HSI was looking for Ms. Chung and that they had an administrative warrant for her arrest.
8. When asked why there was an administrative warrant, the agent stated: "Due to the situation with the protesting, the State Department is at liberty to revoke her LPR status."
9. Later that same evening, I received a call and voicemail from someone identifying himself as an Assistant United States Attorney, Perry Carbone.
10. I passed his information along to Naz Ahmad, another attorney advising Ms. Chung.

Executed on: March 23, 2025

Respectfully submitted,

  
\_\_\_\_\_  
Nayantara Bhushan